

Violations found during Plan review for BPXA - Greater Prudhoe Bay Unit

Facility was inspected on 09/24/2007. The type of inspection conducted was Initial Inspection

Associated codes:

Alaska ID Number: AK-07-735, SIC Code: 1330, NAICS Code: 211111

Facility Name	BPXA - Greater Prudhoe Bay Unit
Street Address	None
City:	Prudhoe Bay
State:	AK
Zip Code:	99734
County (Borough Municipality)	North Slope Borough
Phone Number	907 564-4566 (Mike Bronson - BPXA HQ Anchorage
Spoke With	Mike Bronson, Crisis Management Coordinator

Waterways and Geographical Coordinates Information:

Waterways that could be impacted: All GPB stations are surrounded by a wet tundra environment. The tundra contains open ponds and streams that drain to Prudhoe Bay of the Beaufort Sea. Some stations are also located directly along Prudhoe Bay or very close to the shoreline.

Description of pathway to water of the US:

GPB facility stations are within/surrounded by a tundra wetlands environment containing ponds and streams, with some oil storage containers or process equipment located as close as 300 feet from the tundra. Some facility stations are directly along Prudhoe Bay of the Beaufort Sea. The pathway to US waters from facility stations is via overland surface migration.

Discharge Pathways:

Direction: all Distance: as little as 300 feet

Geographical Coordinates:

Latitude: N 70.252778 (for Prudhoe Bay Operations Center) Longitude: W 148.347222 (for Prudhoe Bay Operations Center)

Listed below are the areas of the SPCC Plan Review which had deficiencies

112.6(a) Preparation and Self-Certification of Plan for Qualified Facilities - Deficiency Explanation:

112.6(c) Environmental Equivalence and impracticability for Qualified Facilities (New requirement as of 2007) - Deficiency Explanation:

Equivalent protections from deviations - Deficient

Commented [K1]: 1

112.7(a)(3) Facility Description - Deficiency Explanation: a: SPCC Plan facility diagrams do not show all oil storage containers found at facility stations (example: some tanks, and the oil separation and treating vessels and OFOE noted at many sites). b: not all oil storage containers (including the oil separation and treating vessels and OFOE noted at many sites) appear in container lists in the SPCC Plan. #5: SPCC Plan does not describe secondary containment protection at oil product truck loading areas. #6 - SPCC Plan includes an impracticability claim for GPB "cross-country" pipelines and transformers/circuit breakers but claim description does not consider all alternatives and is considered inadequate for the OFOE as well as SPCC-regulated flowlines, gathering lines, and intra-facility piping that lie over gravel pads.

a. **Diagram of Facility**

Deficient

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b. **Container capacity; oil type(i)**

Deficient

Commented [K3]: 3

g. Notification phone list (vi)

Adequately Addressed

Adequate secondary containment per 112.7(c) requirements - Deficient

Commented [K4]: 4

Statement of impracticability per 112.7(d) - Deficient

Commented [K5]: 5

112.8(c); 112.12(c) Bulk Storage Containers - Deficiency Explanation: #2: presence of adequate secondary containment for Turbinol Select tanks at the BOC Bulk Chemical site is not clear in the SPCC Plan or at the tanks. #11: no SPCC Plan secondary containment discussion for mobile/portable containers at the BOC Bulk Fuel and Bulk Chemical sites, and secondary containment is not apparent at those locations.

Adequate secondary containment (c)(2) - Deficient

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Alarm Deficiency Explanation: a-e: no alarm information is presented in the SPCC Plan for bulk storage containers 3 sites considered as non-production facilities but currently not addressed as such in the SPCC Plan: East C Pad, and BOC Bulk Fuel and Bulk Chemical sites.

High-level audible or visual alarms (i) - Deficient

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High-level pump cutoffs (ii) - Deficient

Commented [K8]: 8

Signal system for gauger to pump station (iii) - Deficient

Commented [K9]: 9

Fast response system for determining liquid level; personnel monitor gauges and filling (iv) - Deficient

Commented [K10]: 10

Liquid level sensing devices regularly tested (v) - Deficient

Commented [K11]: 11

Secondary containment for mobile or portable containers properly located

(c)(11)(freeboard*) - Deficient

Commented [K12]: 12

112.8(d); 112.12(d) Transfer Operations, Pumping, and Facility Process - Deficiency Explanation: #6: discussed in the SPCC Plan for the one site recognized as a non-production facility (the COTU), but not addressed for the other 3 sites also considered to be non-production related (East C Pad, and BOC Bulk Fuel and Bulk Chemical sites).

Warning to vehicles of aboveground piping; other oil transfer operations (d)(5) - Deficient

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Violations found during field inspection for BPXA - Greater Prudhoe Bay Unit

Facility was inspected on 09/24/2007. The type of inspections was Initial Inspection

Facility Location Information:

Facility Name	BPXA - Greater Prudhoe Bay Unit
Mailing Address	None
City:	Prudhoe Bay
State:	AK
Zip Code:	99734
County(Borough Municipality)	North Slope Borough
Phone Number	907 564-4566 (Mike Bronson)
Spoke With	Mike Bronson, Crisis Management Coordinator - BPXA HQ, Anchorage

Waterways and Geographical Information:

Waterways that could be impacted:All GPB stations are surrounded by a wet tundra environment. The tundra contains open ponds and streams that drain to Prudhoe Bay of the Beaufort Sea. Some BPXA oil processing or storage stations within GPB are also located directly along Prudhoe Bay or very close to the shoreline.

Description of pathway in waters of the US:

Discharge Pathways:

Direction:all directions Distance:as little as 300 feet

Geographical Coordinates:

Latitude:N 70.252778 (for Prudhoe Bay Operations Center) Longitude:W 148.347222 (for Prudhoe Bay Operations Center)

Listed below are the areas of the inspection which had deficiencies:

112.7(c) General Secondary Containment - Deficiency Explanation: #1: SPCC Plan does not describe secondary containment protection at oil product truck loading areas.

(1) **General Secondary Containment.** Deficient

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112.8 (c); 112.12 (c) Bulk Storage Containers -

Deficiency Explanation: #2: presence of adequate secondary containment for Turbinol Select tanks at the BOC Bulk Chemical site is not clear in the SPCC Plan or at the tanks. #8: no SPCC Plan discussion for secondary containment of mobile/portable containers at the BOC Bulk Fuel and Bulk Chemical sites, and containment not apparent at those locations.

(2) **Adequate secondary containment -** Deficient

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(8) **Containers engineered to avoid discharges -** Deficient

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Alarm Deficiency Explanation: #'s 1-5: at the BOC Bulk Fuel site, only a gauge reading in unknown units was observed inside a building, with no apparent monitoring procedures or alarms at the truck unloading area. Tanks at the BOC Bulk Chemical site lacked overfill alarms, cutoffs, and monitoring procedures. Uncertain presence of overfill prevention devices or procedures at East C Pad. #8: no SPCC Plan discussion for secondary containment of mobile/portable containers at the BOC Bulk Fuel and Bulk Chemical sites, and containment not apparent at those locations.

(1) **High-level audible or visual alarms -** Deficient

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(2) **High-level pump cutoffs -** Deficient

Commented [K18]: 18

(3) **Signal system for gauge to pump station -** Deficient

Commented [K19]: 19

(4) **Fast response system for liquid level; person monitoring gauges and filling -** Deficient

Commented [K20]: 20

(5) **Liquid level sensing devices tested -** Deficient

Commented [K21]: 21

(8) **Secondary containment for mobile or portable containers; properly located or positioned -** Deficient

Commented [K22]: 22

112.8(d); 112.12(d) Transfer Operations, Pumping, Facility Process -

Deficiency Explanation: #4: oil piping at the BOC Bulk Fuels site is supported on timbers. Some timbers appeared to have shifted, leaving the integrity of the piping supports in question.

(4) **Pipe supports properly designed -** Deficient

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112.9(b) Oil Production Facility Drainage [1973 Rule: 112.7(e)(5)(ii)] -

Deficiency Explanation: #1: Skids at the GC3 facility have fire water floor drains that are normally left open. The drains discharge to a retention pond but there is no analysis of that pond's ability to adequately retain oil (capacity and imperviousness uncertain).

(1) **At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in 112.1(b), drainage is closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is returned to storage or disposed of in accordance with legally approved methods. -** Deficient

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112.9(c) Oil Production Facility Bulk Storage Containers [1973 Rule: 112.7(e)(5)(iii)] -

Deficiency Explanation: #2 below: no secondary containment information is provided in the SPCC Plan for oil separation and treating vessels and equipment; therefore it can not be confirmed whether adequate containment is provided. Portions of some oil separation vessels at LPC, GC1, and GC3 extend beyond the confines of a building, and it is uncertain if secondary containment is provided for the vessel portions outside the structures.

(2) **Secondary containment provided for all tank battery, separation and treating facilities with capacity to hold the capacity of largest single container *and sufficient freeboard for precipitation* -**
Deficient

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